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December 16, 2019

Via ECF

Hon. Loretta A. Preska
United States District Court
Southern District of New York
Daniel Patrick Moynihan U.S. Courthouse
500 Pearl Street
New York, NY 10007

RE: *Petersen Energia Inversora, S.A.U. v. Argentine Republic*, No. 15-cv-02739; *Eton Park Capital Mgmt., L.P. v. Argentine Republic*, No. 16-cv-08569

Dear Judge Preska:

We write on behalf of the Argentine Republic with respect to the above-captioned actions. Pursuant to Rule 1.E of Your Honor's Individual Rules of Practice, due to the transition of government, the Argentine Republic respectfully writes to request an extension until March 16, 2020 for a reply brief in connection with Defendants' Joint Motion to Dismiss for Forum Non Conveniens (the "FNC Motion"). (*Petersen* ECF No. 125; *Eton Park* ECF No. 66.) Defendant YPF consents to this request. Plaintiffs do not consent and have indicated that they will file a response.

Pursuant to the briefing schedule this Court ordered on July 24, 2019, Defendants filed the FNC Motion on August 30, 2019. (*Petersen* ECF No. 110; *Eton Park* ECF No. 51.) On September 17, 2019, Your Honor sua sponte adjourned the briefing schedule, extending Plaintiffs' opposition from October 30, 2019 to December 7, 2019, and setting Defendants' time to reply to January 7, 2020. On December 6, 2019, Plaintiffs filed their opposition, which included four Argentine

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expert reports and declarations of several fact witnesses. (*Petersen* ECF Nos. 126-29; *Eton Park* ECF Nos. 67-70.) In addition to the need for time to consider this voluminous submission, the reply submission by the Argentine Republic may require new government officials and experts to take positions and provide responsive declarations.

In the meantime, on December 10, 2019, the new President of Argentina was inaugurated. Given the ongoing transition in the administration and need for adequate time for newly installed officials to be in a position to provide instructions to counsel in this litigation, we respectfully request that the reply deadline be extended to March 16, 2020.¹

We thank Your Honor for the Court's attention to this matter.

Respectfully submitted,

/s/ Scott D. Musoff
Scott D. Musoff

cc: All counsel of record (via ECF)

¹ Even absent the Republic's transition of administration, Defendants would need a significant extension to address the voluminous submissions by Plaintiffs (who had over three months to respond), especially given the upcoming summer holiday season in Argentina when potential expert and fact witnesses may be unavailable.